

ORIGINAL

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

Received  
SEP 20 2016  
Copyright Royalty Board

In the Matter of	)	
	)	
Distribution of 2004, 2005, 2006, 2007,	)	Docket No. 2012-6 CRB CD 2004-2009
2008 and 2009 Cable Royalty Funds	)	(Phase II) (REMAND)
	)	
In the Matter of	)	
	)	
Distribution of 1999-2009 Satellite	)	Docket No. 2012-7 CRB SD 1999-2009
Royalty Funds	)	(Phase II) (REMAND)
	)	

**INDEPENDENT PRODUCERS GROUP'S MOTION TO STRIKE THE DECLARATION  
OF ERKAN ERDEM, Ph.D., FILED WITH THE SETTling DEVOTIONAL  
CLAIMANTS REPLY TO THE OPPOSITION TO THE  
SDC'S MOTION TO STRIKE AMENDED DIRECT STATEMENT  
OF INDEPENDENT PRODUCERS GROUP**

Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG") hereby submits its Motion to Strike the Declaration of Erkan Erdem, Ph.D. filed with the Reply of the Settling Devotional Claimants ("SDC") to IPG's Opposition to the SDC's Motion to Strike Amended Direct Statement of Independent Producer's Group.

Attached to the SDC's Reply is a new Declaration of Erkan Erdem, Ph.D. which includes new claims and arguments not contained in the SDC's motion. Because IPG has no opportunity to respond to these new claims and arguments, IPG moves to strike Dr. Erdem's Declaration.

In the alternative, IPG petitions the Judges to be allowed to file a responsive brief and supporting declaration addressing Dr. Erdem's Declaration.

## CONCLUSION

For the foregoing reasons, either Dr. Erdem's Declaration should be stricken, or IPG should be permitted to file a responsive brief and supporting declaration.

Respectfully submitted,

Dated: September 27, 2016

\_\_\_\_\_/s/\_\_\_\_\_  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of September, 2016, a copy of the foregoing was sent by electronic mail to the parties listed on the attached Service List.

\_\_\_\_\_/s/\_\_\_\_\_  
Brian D. Boydston

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